

Exhibit C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OCLC, INC.,

Plaintiff,

v.

**Baker & Taylor, LLC; Bridgeall Libraries
Ltd.,**

Defendants.

Case No. 2:25-cv-00309

Judge Edmund Sargus, Jr.

**Magistrate Judge Elizabeth Preston
Deavers**

PROPOSED NOTICE OF DEPOSITION

Pursuant to Federal Rule of Civil Procedure 30(b)(6), counsel for Plaintiff OCLC, Inc. (“OCLC”) will take the deposition of the designated representative(s) of Defendant Baker & Taylor, LLC, beginning at 9:00 a.m. on [DATE], 2025 at a location agreed upon by the parties. OCLC will take the deposition of the designated representative(s) on the matters below and on reasonably related matters from day to day until completed. The deposition will be taken before an officer appointed or designated to administer oaths and will be transcribed by stenographic means. This deposition is being taken for the purposes of discovery, for use at the preliminary injunction hearing, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure and the local rules.

MATTERS UPON WHICH TESTIMONY IS SOUGHT

1. Defendants’ corporate structure, including Defendants’ subsidiaries, affiliates, and related entities and those entities’ involvement in the development, strategy, design, operation, implementation, and/or oversight of BTCat;

2. Agreements between Defendants or any of their affiliated entities, and their customers, including any agreements that include a provision requiring access to and/or a license to use the customer's cataloging records and any third-party cataloging agreements; any OCLC customers that have signed such agreements, and the customers' performance under the same; and the strategies behind these agreements;
3. Your knowledge and understanding of WorldCat records and data, OCLC's Framework Agreement, OCLC's WorldCat Rights & Responsibilities for the OCLC Cooperative, and OCLC's prior efforts to protect WorldCat through litigation and other means;
4. The 2019 WorldCat Data Licensing Agreement (attached as Exhibit 1) and Baker & Taylor's performance under the same;
5. Your access to and use of WorldCat records and data, including but not limited to Your use of WorldCat records and data in BTCat and Your other products and services;
6. The development of, investment in, and design and operation of BTCat, including how Defendants and any of its affiliated entities use BTCat data in any other productions and/or services and how bibliographic records and data are submitted to, merged to, linked to, uploaded to, transferred to, or otherwise used by BTCat;
7. The allegations and claims asserted in the Complaint filed in this litigation;
8. Any of Your discovery responses to the requests served concurrently with this notice and any documents produced in response to those requests; and
9. Any harm to Defendants that Defendants assert would result from OCLC's requests injunction.